

# Exhibit C

**Gerstner, Alyssa**

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**From:** Lollar, Tirzah  
**Sent:** Friday, September 30, 2022 5:52 PM  
**To:** Andrew Stephens; Heather Hacker  
**Cc:** Martin, Meghan C.; Gerstner, Alyssa; Pieper, Megan; Raymond Winter; Eugenia Krieg; Drew Wright; Sinty Chandy; Christopher Hilton; Amy Hilton; Benjamin Walton; Sheehan, Christian; Odell, Christopher M.; Margolis, Craig D.; zzz.External.lgodesky@omm.com; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com; Michael Moore; zzz.External.dashby@omm.com; Reeder-Ricchetti, Emily  
**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America In

Andrew:

As Emily indicated in her email from yesterday, Affiliates have now identified 21 custodians (in addition to the original 9) that they believe are most likely to have documents related to "Medicaid," construed broadly. The list of the 21 additional custodians is below.

Thank you for confirming Relator's position on Affiliates' motion for clarification. However, Affiliates are disappointed that, inconsistent with the Court's scheduling order and Rule 37(a)(1), Relator has declined to meet and confer regarding Affiliates' efforts to comply with the Court's September 20 Order. Affiliates will respond to Relator's request for sanctions on or before October 5, as directed by the Court. Dkt. 184 at 8.

PPGC:

[REDACTED] \*

Cirene Licea

Jeffrey Palmer

Alfred Curtis

[REDACTED] \*

\*

\*

\*

Rene Pilarte

Megan Redman

Jackie Kinabrew

Teo Norman

Bonnie Smith

PPGT:

Keri Copeland

Marianne deJong

Dan Sannes

Beth Watson

Kasia White

Sarah Wheat

PPST:

[REDACTED] \*

\*

\*Please note that the employees identified with an asterisk are non-publicly identified current or former Affiliate employees, so Affiliates are designating this email as Attorney's Eyes Only under the Protective Order.

Thanks,  
Tirzah

---

Tirzah Lollar  
Partner | [Bio](#)

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**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Friday, September 30, 2022 12:40 PM

**To:** Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Cc:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; zzz.External.lgodesky@omm.com <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; brown@blackburnbrownlaw.com; zzz.External.jchapa@omm.com <[jchapa@omm.com](mailto:jchapa@omm.com)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; zzz.External.dashby@omm.com <[dashby@omm.com](mailto:dashby@omm.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc

External E-mail

Emily, in response to your question concerning RFPs 10 and 11, we expect full compliance with the Court's order which includes production of all documents responsive to those RFPs. Your clients have documents responsive to these RFPs which should have been produced months ago.

Andrew

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**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Friday, September 30, 2022 8:59 AM

**To:** Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Cc:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com);

**Subject:** Re: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America In

Thanks, Emily. We'll raise these issues in our sanctions and show cause motion.

Andrew

**Andrew B. Stephens**

Partner

Hacker Stephens LLP

[www.hackerstephens.com](http://www.hackerstephens.com)

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**From:** Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>

**Sent:** Thursday, September 29, 2022 7:13 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Cc:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com) <[brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com)>; [jchapa@omm.com](mailto:jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [dashby@omm.com](mailto:dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America In

Andrew,

As we discussed on the call today, Affiliates are working in good faith to comply with the Court's September 20 Order. Affiliates will produce all non-privileged documents and emails that hit on the search term "Medicaid" in the emails of custodians who Affiliates identify as most likely to have documents related to Medicaid. Affiliates are first prioritizing Ken Lambrecht, Sheila McKinney, Debra Cleaver, Melaney Linton, Ronda Exnicious, Ella Conrad, Kathy Luck, Jeffrey Hons, and Polin Barraza, the custodians whose data was previously collected. Affiliates will make rolling productions with a significant production expected next week. The first productions will include documents from Affiliates' original set of 9 custodians. Affiliates are also working to identify and collect numerous additional custodians likely to have documents related to Medicaid and anticipate being able to provide the names and positions of those additional custodians tomorrow.

You stated on today's call that you expect Affiliates to produce every document and communication from any Affiliate current or former employee from 2010 to 2022 that hit on the search term "Medicaid." As Tirzah explained on the call, while Affiliates are working very hard and in good faith to identify custodians most likely to have documents and communications referencing Medicaid, it would be impossible for them to produce every such document given that the Affiliates collectively have employed over 2,000 employees in that twelve year period and the term "Medicaid" is

extremely broad. Once Affiliates provide their expanded list of custodians tomorrow, we invite Relator to meet and confer regarding any specific custodians or even positions of custodians the Relator may think should be added.

Affiliates also intend to seek clarification that the September 20 Order relates only to the RFPs related to Medicaid and does not include RFPs 10 and 11. We assume based on the conversation today that Relator would oppose such a motion, but please let us know.

Thanks,  
Emily

Emily Reeder-Ricchetti  
Associate | [Bio](#)

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**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Monday, September 26, 2022 5:31 PM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>;  
Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>;  
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[zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>; Weberman, Melissa L. <[Melissa.Weberman@arnoldporter.com](mailto:Melissa.Weberman@arnoldporter.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Tirzah,

Now that the Court has granted our motion to compel against the PPFA Affiliates, please provide a list of custodians for each Affiliate and confirm that you will be producing all non-privileged documents and emails for those custodians that hit for the search term "Medicaid." We also need to know when you plan to fully comply with the Court's order.

Andrew

**Andrew B. Stephens**  
Partner

**HACKERSTEPHENS** LLP  
[www.hackerstephens.com](http://www.hackerstephens.com)

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---

**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Thursday, September 8, 2022 6:46 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

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**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Andrew:

Thanks for your note. When will Relator produce his privilege log (*see, e.g.*, Dkt. 162 at 7)? We suggest working towards a reasonable deadline for a mutual exchange of logs by Relator and Affiliates. Let us know what you think.

As for your question about Medicaid, we understand you to be referring to documents requested in Relator's First Set of RFPs for the Affiliates. Relator moved to compel on those (Dkt. 145), so Affiliates will be filing their response next week.

Thanks,  
Tirzah

---

Tirzah Lollar  
Partner | [Bio](#)

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---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Thursday, September 8, 2022 11:52 AM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>; Weberman, Melissa L. <[Melissa.Weberman@arnoldporter.com](mailto:Melissa.Weberman@arnoldporter.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Tirzah,

Do you have an answer to my question below regarding the privilege log for the 997 emails you identified as privileged in your initial review?

Also are the PPFA Affiliates willing to produce every non-privileged email communication that has the term "Medicaid"?

Andrew

**Andrew B. Stephens**  
Partner

**HACKERSTEPHENS**<sub>LLP</sub>  
[www.hackerstephens.com](http://www.hackerstephens.com)

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---

**From:** Andrew Stephens

**Sent:** Wednesday, September 7, 2022 12:12 PM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [jchapa@omm.com](mailto:jchapa@omm.com); Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [dashby@omm.com](mailto:dashby@omm.com); Weberman, Melissa L. <[Melissa.Weberman@arnoldporter.com](mailto:Melissa.Weberman@arnoldporter.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Thanks, Tirzah. When can we expect the PPFA Affiliates' privilege log for the 997 emails withheld for privilege?

Andrew

**Andrew B. Stephens**  
Partner

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**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Wednesday, September 7, 2022 12:04 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [jchapa@omm.com](mailto:jchapa@omm.com); Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [dashby@omm.com](mailto:dashby@omm.com); Weberman, Melissa L. <[Melissa.Weberman@arnoldporter.com](mailto:Melissa.Weberman@arnoldporter.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Attached please find information on Affiliates' collections, searches, and productions. We are performing additional validation of our predictive coding model and will provide information on that process in a few days.

Ray and TX team, we are still waiting to receive your list of custodians and would appreciate an update on Texas's efforts to collect and produce documents.

Thanks,  
Tirzah

---

Tirzah Lollar  
Partner | [Bio](#)

**Arnold & Porter**

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[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Friday, September 2, 2022 3:50 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>

**Subject:** Re: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Ray and TX teams, please send us your custodians as agreed last week.

Our vendor is still working to pull the info that we discussed regarding Affiliates' collections and searches with the TX folks and Andrew last week. We should be able to send it on Tuesday.

Thanks,



Tirzah

Sent from Nine

---

**From:** Lollar, Tirzah

**Sent:** Monday, August 29, 2022 5:04 PM

**To:** Andrew Stephens; Martin, Meghan C.; Raymond Winter

**Cc:** Eugenia Krieg; Drew Wright; Sinty Chandy; Christopher Hilton; Amy Hilton; Benjamin Walton; Heather Hacker; Sheehan, Christian; Odell, Christopher M.; Margolis, Craig D.; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com); [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com); Michael Moore; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com)

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Ray and TX team, are you willing to identify the custodians that Texas is searching? We think it makes sense for the parties to share this information, provided that everyone agrees to share it.

Thanks,  
Tirzah

---

Tirzah Lollar  
Partner | [Bio](#)

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[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Monday, August 29, 2022 2:32 PM

**To:** Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Meghan, could you provide the names of the 8 custodians referenced in your email?

Thanks,

Andrew

**From:** Andrew Stephens

**Sent:** Friday, August 26, 2022 1:32 PM

**To:** Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [jchapa@omm.com](mailto:jchapa@omm.com); Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [dashby@omm.com](mailto:dashby@omm.com)

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Tuesday 10am CST works, dial-in info below.

Andrew

Andrew Stephens is inviting you to a scheduled personal audio conference.

Topic: Andrew Stephens' Personal Audio Conference

Passcode: 030527

Join via URL: <https://us06web.zoom.us/join/3813009255>

Passcode: 030527

Or One tap mobile (US Toll Free): 8335480282,,3813009255#,,,,\*030527#

Or join by phone:

833 548 0282 (US Toll Free)

+1 253 215 8782 (US Toll)

+1 301 715 8592 (US Toll)

+1 312 626 6799 (US Toll)

+1 346 248 7799 (US Toll)

+1 646 558 8656 (US Toll)

Conference ID: 381 300 9255

Passcode: 030527

---

**From:** Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>

**Sent:** Friday, August 26, 2022 11:32 AM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy <[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [jchapa@omm.com](mailto:jchapa@omm.com); Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [dashby@omm.com](mailto:dashby@omm.com)

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Andrew -

Today doesn't work and Monday is not great. Are you available on Tuesday? We can do 11-2 ET or anytime after 3 ET on Tuesday.

Meghan

---

Meghan Martin

Attorney and Advisor | [Bio](#)

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---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Thursday, August 25, 2022 6:49 PM

**To:** Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>;

Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sinty Chandy

<[Sinty.Chandy@oag.texas.gov](mailto:Sinty.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton

<[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker

<[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M.

<[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>;

[zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com);

[zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>;

[zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

External E-mail

Thank you, Meghan. Is there a time tomorrow or Monday when we could have a call to meet and confer regarding the review and document production?

Andrew

**Andrew B. Stephens**

Partner

**HACKERSTEPHENS** LLP

[www.hackerstephens.com](http://www.hackerstephens.com)

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---

**From:** Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>

**Sent:** Thursday, August 25, 2022 11:00 AM

**To:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Andrew

Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Cc:** Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sindy Chandy <[Sindy.Chandy@oag.texas.gov](mailto:Sindy.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com); [jchapa@omm.com](mailto:jchapa@omm.com); Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; [dashby@omm.com](mailto:dashby@omm.com)

**Subject:** RE: Case 2:21-cv-00022-Z United States of America et al v. Planned Parenthood Federation of America Inc et al

Ray and Andrew:

In response to Texas providing their search terms, Affiliate Defendants are providing similar information. In preparing to respond to Texas's and Relator's First Sets of RFPs, the Affiliates Defendants identified 8 custodians who would have emails and documents responsive to those requests. Those custodians' full mailboxes were collected and once the mailboxes were loaded to Affiliates Defendants' vendor's processing platform, the attached list of search terms were used to determine the search universe. The search hits produced approximately 36,000 emails with families to be reviewed. Those documents were reviewed and responsive non-privileged documents have been produced in the rolling production made by Affiliates Defendants.

During the course of review, Affiliates Defendants learned that the full mailboxes of 2 of the 8 custodians were not initially collected correctly. Those mailboxes were recollected and upon running search terms, resulted in a new universe of approximately 77,000 emails with families from those 2 custodians. Prior to the Court's issuance of the Order [Dkt. 139] adopting the parties' stipulation and proposed order regarding production of electronically stored information and hard copy documents, Affiliate Defendants decided to use the Continuous Active Learning ("CAL")/TAR methodology to use the coding from the initial set of 36,000 emails to determine what percentage of the 77,000 would be review. CAL was then used to go through 3 more rounds of review to determine if more documents needed to be reviewed. Any responsive non-privileged documents from the set of reviewed documents have been produced in our rolling productions made by Affiliates Defendants.

Please let me know if you have any questions or if you would like to discuss further.

Regards,  
Meghan

---

Meghan Martin  
Attorney and Advisor | [Bio](#)

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---

**From:** Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>

**Sent:** Wednesday, August 3, 2022 6:02 PM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Sindy Chandy <[Sindy.Chandy@oag.texas.gov](mailto:Sindy.Chandy@oag.texas.gov)>; Christopher Hilton <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Benjamin Walton <[Benjamin.Walton@oag.texas.gov](mailto:Benjamin.Walton@oag.texas.gov)>; Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Sheehan, Christian <[Christian.Sheehan@arnoldporter.com](mailto:Christian.Sheehan@arnoldporter.com)>; Odell, Christopher M.

External E-mail

Tirzah and Danny –

Thank you again for taking the time to confer with us Monday and yesterday. Pursuant to our discussion, Texas will search custodial files for relevant HHSC and HHSC-OIG witnesses using the attached search terms. We have asked HHSC to begin the searches using the attached terms. We remain available to meet and confer about the terms. Please let us know if you would like to discuss.

Sincerely,

Michael J. Moore  
Assistant Attorney General  
Civil Medicaid Fraud Division  
(512) 936-1449  
[michael.moore@oag.texas.gov](mailto:michael.moore@oag.texas.gov)

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